

**REMARKS**

Claims 1-26 are currently pending in the application. Applicant thanks Examiner for the indication that claims 4-22 are allowable. By this amendment, claims 1, 4, 9, 14-15, and 19- 20 have been amended, and new claims 23-26 have been added. The foregoing separate sheets marked as "Listing of Claims" shows all the claims in the application, with an indication of the current status of each.

**Request for Information**

Examiner has required that Applicant provide the definition of the terms "consonant mark", "p-sound mark" and "romaji alphabet letters, numerals, and symbols". In addition, Examiner has requested an illustration of what these marks, letters and symbols look like.

Applicant herewith supplies as Appendix B a copy of United States patent 4,872,196 (Royer et al.) which contains definitions and illustrations of terms as requested by the Examiner. The "consonant mark" is discussed in column 2, at lines 54-64, where this variation in pronunciation is described as indicated by a "ten-ten" or " ". The "p sound mark" is discussed in column 3, at lines 7-10, where it is noted that the mark resembles a degree sign (°).

Romaji letters, numerals and symbols are not discussed in 4,872,196, but a definition is given in the attachment Appendix C, which was downloaded from the indicated Web site. Romaji letters are English-style (i.e. Roman alphabet) letters that are used to write the sounds of a Japanese word phonetically. In other words, they are an alternative to Japanese letters in which English letters are used to write out the sound of Japanese syllables according to their Japanese pronunciation , e.g. A, I, U, E, O, KA, KI, KU, KE, KO, etc. They are used chiefly for trademarks and advertising. Applicant notes that this same Web site download provides a further explanation of consonant mark and p-sound mark, as well as a comprehensive chart of the Japanese alphabets (page 4 printed in landscape format) where, in the last five columns, the use of the consonant mark (") and the p-sound mark (°)are illustrated.

Further, the Romaji numerals that are used in the practice of the present invention are standard English numerals 0, 1, 2, 3, 4, 5, 6, 7, 8, and 9, and the symbols would include those which are well-known in English writing, such as !, ", #, \$, %, and °.

In view of the foregoing, Applicant respectfully submits that the requirement has been fulfilled.

### **Drawings**

Examiner has objected to the drawings as failing to comply with 37 CFR 1.84(p)(5) because they do not include the reference sign "5" for a determining key mentioned in the description of Figure 1 on page 17, line 18. Applicant herewith attaches a replacement sheet for Figure 1 which includes a generic representation of such a determining key 5 as Appendix C. Applicant requests replacement of Figure 1 with the Replacement Figure 1, and submits that the replacement figure is sufficient to overcome this objection.

### **Claim Objections**

Claims 1- 3 have been objected to due to informalities. Examiner states that the limitation "designating corresponding column and row coordinates *in a predetermined order* with a position input means" should be amended to "designating corresponding column and row coordinates with a position input means". Applicant has hereby amended claim 1 to remove the phrase "in a predetermined order" as suggested by Examiner.

Claims 4-22 are objected to due to several informalities.

In Claim 4, line 4 the limitation "(i.e., m)" is recited. Examiner has requested removal of this phrase, as only referenced numerals may be included in parentheses. Applicant has hereby amended Claim 4 by deleting the phrase "(i.e., m)".

Examiner states that at lines 5-6 of Claim 4, the phrase "with the consonant at a reference position and having a predetermined radius" should be amended to "with a center position and a predetermined radius". According to Examiner's instruction, Applicant has hereby amended claim 4 to recite "with a center position and a predetermined radius" instead of "with the consonant at a reference position and having a predetermined radius".

Examiner states that at line 11 of Claim 4, the phrase "being capable of" should be deleted. Applicant has hereby amended Claim 4 to delete the phrase. Applicant has likewise amended claims 14 and 15 in like manner. In claim 14, the phrase "being capable of" has been deleted. In claim 15, the phrase "capable of being switched" has been deleted and replaced with "switchable" to conform to standard US claim practice.

Examiner states that the term “after” in line 14 should be amended to “before” and the term “then” in line 15 should be amended to “before being”. Applicant has hereby amended line 15 of claim 4 to recite “before being” instead of “then”. However, Applicant notes that line 14 does not recite the term “after” as stated by Examiner. Rather, the term “before” is recited. Applicant assumes that this was a typographical error on the part of Examiner, and that Examiner’s intent was to require the replacement of the term “before” by the term “after”. Applicant has hereby amended claim 4 to recite “after” rather than “before” at line 14.

In view of the foregoing, applicant respectfully requests withdrawal of these objections.

**Claim Rejections - 35 USC § 112**

Claims 1-3 stand rejected under 35 U.S.C. § 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Examiner states that the claims recite the limitation “a matrix array of M columns and N rows”, and that this is indefinite because the number of columns and rows cannot be determined. Examiner states that the objection can be obviated by amending the limitation to “a matrix array”.

Applicant has hereby amended Claim 1 to recite “a matrix array of a plurality of columns and rows” in lieu of “a matrix array of M columns and N rows”, thus removing the designations “M” and “N” and making the determination of the number of columns and rows unnecessary. Applicant submits that it would be understood that a matrix would contain a plurality of columns and rows. Applicant thus submits that this objection is obviated, and respectfully requests withdrawal of this objection.

**Claim Rejections - 35 USC § 102(b)**

Claims 1-3 stand rejected under 35 USC § 102(b) as being anticipated by Royer et al., U.S. patent 4,872,196. Examiner states that, with respect to claim 1, Royer et al., discloses a Japanese letter input method of inputting letters in a letter set used in a Japanese letter input device, and that the method comprises the steps of 1) prearranging predetermined letters and symbols in a matrix array of M columns and N rows, and 2) inputting any desired letter or symbol by designating the corresponding column and row coordinates in a predetermined order with a position input means.

Original claim 1 recites a Japanese letter input method comprising the steps of 1) prearranging predetermined letters and symbols in a matrix array of M columns and N rows, and 2) inputting any desired letter or symbol by designating the corresponding column and row coordinates in a predetermined order with a position input means. Claim 1 has hereby been amended to recite that the position input means comprises a direction designation unit. Applicant submits that the recitation of this feature of the invention amply distinguishes the method of claim the present invention from that of Royer et al.. Royer et al. disclose the use of a "rocker" key to indicate a particular consonant or vowel of the Japanese alphabet arranged in a matrix. Rocking left scrolls across the top of the consonant columns of the matrix, and rocking right scrolls down the vowels in a consonant column. A separate key is used to indicate final selection of an indicated consonant-vowel combination. In the method of Royer et al., there is no need to determine a "direction" of input by the position input means. Depressing the key to the left or to the right (the only choices) allows the user to simply "march" through the displayed choices in a one-dimensional, linear fashion until a desired selection is located.

In contrast, in the present invention, the position input means includes a direction designation unit with a pointer. In order to designate a particular consonant, it is necessary to detect the two-dimensional, radial positioning of the pointer within a circle, the base of the pointer being located at the center of the circle. A column representing a desired consonant is initially selected by flexing the tip of the pointer away from the center of the circle toward one of several "direction designation points" which are, in one embodiment, located around the circumference of the circle. After locating the tip of the pointer at a particular direction designation point along a radius of the circle, the pointer tip is moved circumferentially around the circumference of the circle to access additional points corresponding to vowels to be paired with the consonant to form a desired Japanese letter. Once the desired combination is identified, the letter may be definitively selected by either returning the pointer tip to the beginning center position, or by pressing a separate determining key (depending on the embodiment). Because many positions around the circumference of the circle are available for selection, it is necessary to be able to accurately detect the radial, two-dimensional position of the pointer within the circle in order to ascertain which consonant and/or vowel has been selected. This is not the case in the method of Royer, where the choices are either a left or right one-dimensional rocking of the

switch, i.e. there is no directional component to the selection process. Applicant notes that several other embodiments of the present invention are also described in the specification, such as that in which the direction designation points are located on two concentric circles (see figures 23a and 23b) and are accessed by tilting a pointer by either a small or large angle; (see, for example, Figures 18b, 19b and 22), and in which the direction designation unit is a “pad” (see Figure 20). In each embodiment, however, a direction designation unit is present and is used to indicate the positions on the circle which correspond to a desired Japanese letter.

Support for the amendment to claim 1 is found in the specification, for example, on page 16, beginning at line 27, through page 17, lines 1-4, and page 19, lines 20-25, where the a direction designation unit and its functions are described. Applicant therefore submits that this amendment does not represent the introduction of new matter.

In view of the foregoing, Applicant respectfully requests reconsideration and withdrawal of the rejection of claim 1. Further, since claims 2 and 3 depend from claim 1, the subject matter of claims 2 and 3 should also now be deemed patentable.

Applicant further submits that in the method of Royer et al., a matrix of M columns and N rows is defined for designating letters and symbols. Also, an input means is used to designate a 50-letter set, including numerals and symbols, which are prearranged in a matrix. In contrast, in the practice of the present invention when inputting a Japanese letter, the consonant is first designated by selecting one of several possible predetermined radially disposed directions on a circle, and the vowel is designated by shifting the position, in a step-wise fashion and in a particular circumferential direction, away from the direction that was set for the consonant designation to a point on the circle circumference. The method of the present invention is thus distinguished from the Royer et al. method, in which one particular key is allotted to a consonant, and a vowel is designated by depressing that key a predetermined number of times.

In order to clarify the above difference, new claims 23-25 have been added to the application. New claim 23 recites that predetermined letters and symbols are arranged in a concentric circle form in M radially disposed directions and N steps; and letters or symbols are input by designating, in a predetermined sequence, coordinates corresponding to the M directions and N steps by using a position input device, the actual selection of letters or symbols being made using a memory unit with an arrangement of M rows and N columns corresponding to the

M directions and N steps. Support for new claim 23 is found in the specification at: page 27, lines 20-22 (where the selection of a consonant by choosing a radial direction is described); and at page 28, lines 13-28, (where the selection of vowels by steps is described); and on page 17, lines 7-8 and Figure 21(for a memory unit). New claims 24 -26 are dependent on claim 23, and recite the embodiments in which: 50-letter set of kana letters is positioned such that the same consonant is arranged in the same direction and the letters of the same vowel are arranged on the same circumference, and symbols are disposed in directional concentric circles (claim 24); the symbols include the p-sound (claim 25); and the letter set includes romaji letters, numerals and symbols (claim 26). Support for the dependent claims is found, for example: on page 8, lines 14-19 (claim 24); on page 8, lines 18-19 (claim 25); and page 8, lines 20-22 (claim 26).

#### **Other amendments**

Claim 4 has been further amended to more clearly recite the relationships between the various components of the input device. This amendment is principally the result of putting the language in more standard English form, and as such does not constitute the addition of new matter. Applicant respectfully requests entry of the amendment.

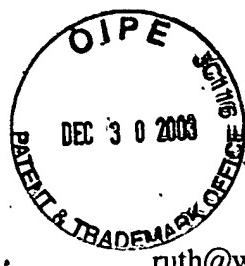
Claim 9 has hereby been amended to recite “direction designation position” in lieu of “direction designating position” at line 3, in order to conform to language used elsewhere in the specification and claims, which otherwise consistently refers to this feature as a direction designation position (see for example, claim 4). Applicant submits that this amendment does not introduce any new matter and respectfully requests entry of the amendment.

Claim 19 has hereby been amended to include the word “a” before the phrase “large angle” at line 5, and Claim 20 has been amended to include a period at the end of the sentence. Applicant submits that these amendments do not introduce any new matter (they were undertaken in order to comply with standard English grammar and punctuation) and respectfully requests entry of the amendments.

#### **Formal Matters and Conclusion**

In view of the foregoing, it is requested that the application be reconsidered, that claims 1-22 of the present application be allowed, and that the application be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at 703-787-9400 (fax: 703-787-7557; email:

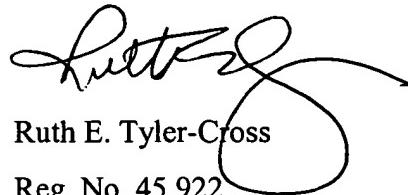


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ruth@wcc-ip.com) to discuss any other changes deemed necessary in a telephonic or personal interview.

If an extension of time is required for this response to be considered as being timely filed, a conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,



A handwritten signature in black ink, appearing to read "Ruth E. Tyler-Cross".

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